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6 | Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

**10 NORTHERN CALIFORNIA GLAZIERS,
11 ARCHITECTURAL METAL AND GLASS
WORKERS PENSION PLAN, et al.**

Case No.: C08-1725 SC

REQUEST FOR CONTINUANCE OF CASE MANAGEMENT CONFERENCE

13 | Plaintiffs,

13

14 KELLY RAYMOND PLEDGER, Individually,
15 and dba PLEDGER GLASS.

Date: July 11, 2008

Time: 10:30 a.m.

Ctrm: 1, 17th Floor

Judge: The Honorable Samuel Conti

16 | Defendant

17

Plaintiffs herein respectfully request a Continuance of the Case Management Conference, currently on calendar for July 11, 2008, for approximately 60 days,

20 1. This statement, not due until July, 2008, is being submitted now as the undersigned
21 will be out of the office between June 28, 2008 and July 9, 2008.

22 2. Defendant's default was entered on May 1, 2008. Thereafter, a question arose as to
23 the status of defendant and his business. Inquiry was made, and the matter was recently clarified.

24 3. Plaintiffs will now attempt to contact defendant to inquire as to stipulating to a
25 judgment for payment, and to providing the documents required for an audit to determine any
26 further amounts due. Should those negotiations prove unfruitful, plaintiffs will file a Motion for
27 Default Judgment. There are therefore no issues to address at a Case Management Conference.

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1 4. Plaintiffs therefore respectfully request that the Case Management Conference,
2 currently scheduled for July 11, 2008 be continued for approximately 60 days to allow plaintiffs to
3 inquire about the possibility of settlement, and if not, to prepare and file a Motion for Default
4 Judgment.

5 5. It is furthermore requested that all previously set deadlines and dates related to this
6 case be continued as well.

7 I declare under penalty of perjury that I am the attorney for the plaintiffs in the above
8 entitled action, and that the foregoing is true of my own knowledge.

9 Executed this 27th day of June, 2008, at San Francisco, California.

10 SALTZMAN & JOHNSON
11 LAW CORPORATION

12 By: _____/s/
13 Muriel B. Kaplan
14 Attorneys for Plaintiffs

10 IT IS SO ORDERED.

18 The currently set Case Management Conference is hereby continued to
19 September 19, 2008 at 10:00 a.m., and all previously set deadlines and
dates related to this case are vacated, to be reset at that Conference.

20 Dated: 6/30/08

28 **-2-**
REQUEST FOR CONTINUANCE OF CASE MANAGEMENT CONFERENCE
Case No. : C08-1725 SC

1 **PROOF OF SERVICE**

2 I, the undersigned, declare:

3 I am a citizen of the United States and am employed in the County of San Francisco, State
4 of California. I am over the age of eighteen and not a party to this action. My business address is
5 44 Montgomery Street, Suite 2110, San Francisco, California 94104.

6 On June 27, 2008, I served the following document(s):

7 **REQUEST FOR CONTINUANCE OF
8 CASE MANAGEMENT CONFERENCE**

9 on the interested parties in said action by placing a true and exact copy of each document in a
10 sealed envelope with postage thereon fully prepaid, in a United States Post Office box in San
11 Francisco, California, addressed as follows:

12 **Kelly Raymond Pledger
13 dba Pledger Glass
14 708 St. Andrews Drive
15 Vacaville, California 95687**

16 I declare under penalty of perjury that the foregoing is true and correct and that this
17 declaration was executed on this 27th day of June, 2008, at San Francisco, California.
18

19
20 _____/s/
21 Vanessa de Fábrega
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